

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

ROBYN KRAVITZ, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF COMMERCE,
et al.,

Defendants.

No. 8:18-cv-1041-GJH

LA UNIÓN DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

v.

WILBUR L. ROSS, in his official capacity as
Secretary of Commerce, *et al.*,

Defendants.

No. 8:18-cv-1570-GJH

**DEFENDANTS' REPLY TO PLAINTIFFS' RESPONSE TO DEFENDANTS'
AMENDED MOTION FOR LEAVE TO WITHDRAW APPEARANCE OF COUNSEL**

Defendants respectfully submit this reply to Plaintiffs' response to Defendants' amended motion for leave to withdraw appearance of counsel. Plaintiffs contend that Defendants have failed to identify any justification for withdrawal and express concern that withdrawal will prejudice them. ECF No. 193 at 1-2. Neither contention has merit.

First, the Attorney General has the statutory authority to send "any officer of the Department of Justice . . . to any State or district in the United States to attend to the interests of the United States" 28 U.S.C. § 517; *see also* 28 U.S.C. § 519 ("Except as otherwise authorized by

law, the Attorney General shall supervise all litigation to which the United States, an agency, or officer thereof is a party, and shall direct all United States attorneys, assistant United States attorneys, and special attorneys appointed under section 543 of this title in the discharge of their respective duties.”). Given this broad authority and the fact that the Civil Division of the Department of Justice continues to represent the Defendants (and new attorneys already have entered their appearances), Plaintiffs’ suggestion that Defendants have failed to satisfy Local Rule 101(2)(b) is misplaced.

Plaintiffs’ concerns about potential prejudice are equally meritless. The Civil Division continues to handle this matter, and new attorneys that have been assigned are entering appearances and already have begun working on the case. Accordingly, the staffing change the Department has made will not affect the posture of the case or cause any disruption in this matter. Defendants do not anticipate seeking any extensions based on the substitution of new counsel, will diligently work to ensure that the substitution of counsel does not prejudice plaintiffs in any way, and intend to respond to Plaintiffs’ discovery on the Court-ordered schedule.

DATED: July 10, 2019

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

DAVID M. MORRELL
Deputy Assistant Attorney General

/s/ Glenn M. Girdharry
CHRISTOPHER A. BATES
GLENN M. GIRDHARRY
COLIN A. KISOR
CHRISTOPHER R. REIMER
DANIEL A. SCHIFFER
Attorneys

United States Department of Justice
Civil Division
950 Pennsylvania Ave., NW, Room 3141
Washington, DC 20530
Tel.: (202) 514-3301
Email: glenn.girdharry@usdoj.gov

Counsel for Defendants